

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRIDGESTONE AMERICAS, INC.,

Plaintiff,

vs.

**INTERNATIONAL BUSINESS
MACHINES CORPORATION,**

Defendant.

Civil Docket No. _____

JURY DEMANDED

**PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE
TO FILE COMPLAINT UNDER SEAL**

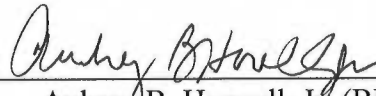
Plaintiff Bridgestone Americas, Inc. moves this court *ex parte* for leave to file its Complaint against Defendant International Business Machines Corporation under seal pursuant to Fed. R. Civ. P. 5.2(d). In support of this motion, Plaintiff states that Bridgestone Americas, Inc. is filing this new case against Defendant International Business Machines Corporation based, in part, on written contracts between the parties. These contracts contain confidentiality provisions regarding the use and disclosure of information found in the contracts. The Complaint contains and references information that is arguably covered by these confidentiality provisions.

Plaintiff is filing this motion to seal the Complaint out of an abundance of caution to prevent a potential dispute between the parties over the issue of confidentiality. Plaintiff is agreeable to unsealing the Complaint at any time that IBM desires, and is of course aware that the Court may unseal the file at any time it deems appropriate.

Dated: October 29, 2013.

Respectfully Submitted,

NEAL & HARWELL, PLC

By: 
Aubrey B. Harwell, Jr. (BPR No. 2559)
Gerald D. Neenan (BPR No. 6710)
Aubrey B. Harwell, III (BPR No. 17394)

One Nashville Place, Suite 2000
150 Fourth Avenue North
Nashville, TN 37219

Attorneys for Plaintiff Bridgestone Americas, Inc.